# **EXHIBIT A**

#### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

SEA STAR LINE, LLC, a limited liability company,	) )
Plaintiff,	) Civil Action No. 05C-245 JJF
-vs-	) )
EMERALD EQUIPMENT LEASING, INC., a corporation,	) ) )
Defendant/Counter-Plaintiff,	, ) , )
-Vs-	)
SEA STAR LINE, LLC,	)
Counter-Defendant.	) ) )
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#### REQUEST FOR PRODUCTION OF DOCUMENTS

Plaintiff/Counter-Defendant, SEA STAR LINE, LLC, requests that Defendant/Counter-Plaintiff, EMERALD EQUIPMENT LEASING, INC., produce the following documents for inspection and copying within thirty (30) days after service of this Request:

#### **DEFINITIONS**

As used in this Request, unless the context indicates otherwise, the following definitions apply:

- 1. "PLAINTIFF", "COUNTER-DEFENDANT", or "SEA STAR" means SEA STAR LINE, LLC.
- 2. "DEFENDANT", "COUNTER-PLAINTIFF", or "EMERALD" means EMERALD EQUIPMENT LEASING, INC. and its subsidiaries, branches,

departments, divisions, and affiliates, as well as all other organizations in which EMERALD has a management or controlling interest. The term "DEFENDANT", "COUNTER-PLAINTIFF", or "EMERALD" also includes all present and former directors, officers, executives, and employees of EMERALD EQUIPMENT LEASING, INC., and all agents, representatives, and other persons acting or purporting to act on behalf of DEFENDANT.

- 3. "MBC" means MBC LEASING CORP. and any of its predecessors, subsidiaries, branches, departments, divisions and affiliates, including but not limited to all other organizations in which it has a management or controlling interest.
- 4. "STORAGE" means STORAGE TRANSFER, LLC and its predecessors, subsidiaries, branches, departments, divisions and affiliates, including but not limited to all other organizations in which it has a management or controlling interest.
- 5. "AGREEMENT" means any contract, understanding or arrangement among two or more persons, written or oral, formal or informal, express or implied.
- 6. "Amended Counterclaim" means the Amended Counterclaim filed by EMERALD in this litigation.
- 7. "Complaint" means the Complaint filed by SEA STAR in this litigation.
- 8. "COMMUNICATION" means correspondence, contact, discussion, and any other kind of written or oral exchange between

two or more persons, including but not limited to all telephone conversations, face-to-face conversations, meetings, visits, conferences, internal and external discussions, and e-mails, memoranda, Blackberry and other wireless records, and other documents setting forth, summarizing or relating to such correspondence, contact, discussion, and other written or oral exchange.

"DOCUMENT" or "DOCUMENTS" mean anything which may be considered to be a DOCUMENT or tangible thing within the meaning of the Federal Rules of Civil Procedure and means the original, or any copy if the original is not available, of all written or graphic matter, drafts, originals and non-conforming copies which contain deletions, insertions, handwritten notes or comments, however produced or reproduced, and any other tangible permanent record. limitation such term shall include all correspondence, e-mails, records of conferences, conversations, and other communications, memoranda, notes, telegrams, summaries, telephone logs and records, Blackberry and other wireless records, teletypes, telefaxes, telexes, private written messages, desk calendars, diaries, appointment books, agendas, minutes of meetings, schedules, reports, studies, appraisals, analyses, lists, surveys, budgets, financial statements, financial projections, financial calculations, contracts, agreements, proposed agreements, notices, canceled checks, charts, graphs, transcripts

interviews, depositions, brochures, affidavits, communications with government bodies, invoices, notes and minutes of meetings of management, boards of directors and committees, intra-office and inter-office communications, results of investigations, working papers, newspaper and magazine articles, records of payments, releases, receipts, computer data, vouchers, papers similar to any of the foregoing and other writings of every kind and description (whether or not actually used) and other records of voice recordings, film, tapes, and other data compilations from which information can be obtained. Any alterations, notes, comments, or other material contained in or attached to a copy which is not included in originals or copies to which the preceding definition refers shall be deemed a separate document within said definition.

- 10. "Emerald Equipment" means any container, genset, chassis, reefer, or other equipment which is covered by and subject to any alleged agreement between EMERALD and SEA STAR, including but not limited to the Equipment Rental Agreement dated as of July 31, 2002, and any container, genset, chassis, reefer, or other equipment for which EMERALD is making any claim against SEA STAR in the Amended Counterclaim.
- 11. "Equipment" means any container, genset, chassis, reefer, and other equipment used in the transport of cargo by vessel, train, truck, or other motor vehicle.
  - 12. "IDENTIFY" or "IDENTITY" has the following meanings:

- a. When used with respect to a natural person, the person's full name, present or last known business address (or the present or last known residence if EMERALD lacks knowledge of that person's present or last known business address), and the present or last occupation and employer.
- b. When used with respect to a person other than a natural person, the person's full name, address of its principal place of business, and the type of entity that it is.
- c. When used with respect to documents, the document's author and each recipient, the type of document, the date of the document, and the substance of the document's contents.
- d. With respect to any agreement, purchase order, on communication:
  - (A) Whether the agreement, purchase order, or communication was oral or written;
  - (B) The identity of each document that embodies, records, reflects, refers to, or summarizes such agreement, purchase order or communication;
  - (C) The date of the agreement, purchase order, or communication; and
  - (D) The identity of each natural person or persons negotiated, who made or has acknowledge of the agreement, purchase order or communication, the location or locations (i.e., address or other place) where the communication took place, the substance of what was said, and the identity of each person mentioned or referenced in the contract, purchase order, or communication.
- e. With respect to any meeting, act, event, occurrence, or occasion:
  - (A) The date on which it occurred;

- (B) The location (i.e., address or other place) where it occurred;
- (C) The identity of each natural person who participated or who has knowledge of the meeting, act, event, occurrence, or occasion;
- (D) The subject matters embraced by the meeting, event, act, occurrence, or occasion;
- (E) The identity of each person mentioned or referenced at such meeting;
- (F) The substance of what was said; and
- (G) The identity of each document which embodies, records, reflects, refers to, or summarizes each such act, meeting, event, occurrence, or occasion.
- 13. "MEETING" means the contemporaneous presence of natural persons, whether or not presence was by chance or prearranged, and whether or not the meeting was formal or informal or occurred in connection with some other activity.
- 14. "MIT" means a document produced by EMERALD that is entitled "Marine Information Technology" and subtitled "Emerald Equipment Move History".
- 15. "Person" means any natural person, corporation, company, partnership, joint venture, association, joint-stock company, institution, trustee in bankruptcy, and any other entity organized for any purpose, as well as any agent of any of the foregoing.
  - 16. "Representative" or "Representatives", used in

reference to a person, means (a) any past or present officer, director, partner, associate, agent, attorney, subsidiary, or affiliate of such person and (b) any other persons acting on behalf of, or in concert with, such persons, including but not limited to insurance brokers or agents, auditors, actuaries, and consultants of any type.

- 17. "TIR" means Trailer Interchange Receipt, Equipment Interchange Receipt, and all other documents evidencing the movement of equipment into or out of a terminal, depot, pool, or other facility and unto and off of a vessel.
- 18. As is necessary to make each request inclusive rather than exclusive, the singular shall include the plural and vice versa; the masculine shall include the feminine and vice versa; and the disjunctive "or" shall include the conjunctive "and" and vice versa.
- 19. A document or communication "relating", "related", or "pertaining" to a given subject means any document or communication that constitutes, contains, embodies, comprises, reflects, identifies, states, refers to, deals with, comments on, responds to, describes, analyzes or is in any way pertinent to that subject, including without limitation documents concerning the presentation of other documents.
- 20. Unless otherwise specified, this document demand runs from April 1, 2002 to the present.

#### INSTRUCTIONS

- 1. If any document responsive to this Request cannot or will not be produced in full, produce each document to the extent possible and specify the reasons for non-production of the remainder.
- 2. If EMERALD considers any Request objectionable, state with specificity the objection and its basis and respond to the Request to the fullest extent consistent with the objection.
- 3. If attorney-client privilege or work product immunity is claimed by EMERALD with respect to a document, identify the author and each recipient of the document and the date such document was created, describe generally the nature of the document (e.g., letter, memorandum, photograph, computer printout, e-mail, wireless record, etc.) and subject matter of the document, and state the basis of the asserted claim of privilege or work product.
- 4. This Request is continuing in character, so as to require EMERALD to file supplemental responses if and as soon as EMERALD obtains additional or different documents which are responsive to this Request.
- 5. EMERALD need not produce documents previously Batesnumbered by EMERALD or SEA STAR and produced by EMERALD.

#### DOCUMENTS TO BE PRODUCED

Documents that EMERALD shall produce are:

1. All schedules that "specifically set forth the

relevant equipment pieces" included in EMERALD's claims in the Amended Counterclaim and that "have been supplied to Sea Star" and "specifically set forth the relevant equipment pieces, dates of usage, and other related information identifying the nature of the defective information contained in the Sea Star 'self-billing reports'", as alleged in paragraph 35 of the Amended Counterclaim.

- 2. All documents pertaining to and identifying Emerald Equipment delivered to Persons other than SEA STAR between January 1, 2002 and April 27, 2002.
- 3. All inventories and related documents pertaining to and identifying Emerald Equipment received by or on behalf of EMERALD, MBC, or STORAGE from other Persons, including but not limited to NPR, Inc., after January 1, 2002.
- 4. All documents pertaining to and identifying each piece of Emerald Equipment that, according to its last movement record before April 29, 2002-such as an MIT, inventory, or other document-entered an NPR, Inc. terminal and that SEA STAR allegedly on-hired.
- 5. All documents pertaining to and identifying each piece of Emerald Equipment that, according to its last movement record before April 29, 2002-such as an MIT, inventory, or other document-left an NPR, Inc. terminal and that SEA STAR allegedly onhired.
  - 6. All documents pertaining to and identifying each

piece of Emerald Equipment that was located in a SEA STAR terminal on April 27, 2002 and that allegedly was on-hired by SEA STAR.

- 7. All documents pertaining to and identifying each piece of Emerald Equipment that, "[a]t the inception of the lease between Emerald and Sea Star", was
  - (a) "in terminals",
  - (b) "in the possession of shippers",
  - (c) "at inland depots",
- (d) "on board NPR vessels purchased by Sea Star", as alleged in paragraph 12 of the Amended Counterclaim.
- 8. All documents pertaining to and identifying each piece of Emerald Equipment that, "[a]t the inception of the lease between Emerald and Sea Star", was
  - (a) in repair facilities,
  - (b) in shipper pools,
  - (c) in shippers' possession,
  - (d) in truckers' possession,
  - (e) in railroads' possession,
  - (f) in-transit involved in carriage of cargo shipments in progress.
- 9. All documents pertaining to and identifying each piece of Emerald Equipment that, "[a]t the inception of the lease between Emerald and Sea Star", was in the possession of Persons, other than SEA STAR, in the Dominican Republic.

- 10. All documents pertaining to and substantiating EMERALD's allocation of a credit or grace period limited to 14 days related to Emerald Equipment that was:
  - (a) in-transit involved in carriage of cargo shipments in progress on April 27, 2002,
  - (b) in-transit involved in carriage of cargo shipments in progress on April 29, 2002.
- 11. All documents pertaining to and identifying each piece of Emerald Equipment that, on April 27, 2002, was
  - (a) in terminals,
  - (b) in inland depots,
  - (c) in repair facilities,
  - (d) in shipper pools,
  - (e) in truckers' possession,
  - (f) in railroads' possession,
  - (g) in shippers' possession,
  - (h) in-transit involved in carriage of cargo shipments in progress.
- 12. All documents pertaining to and identifying each piece of Emerald Equipment that, after April 27, 2002, was in the possession of Persons, other than SEA STAR, in locations such as repair facilities; shipper pools; container yards; truckers', railroads', and shippers' inland depots and terminals; and port facilities.

- 13. All documents pertaining to and identifying each piece of Emerald Equipment that, on or after April 27, 2002, was in the possession of Persons, other than SEA STAR, in the Dominican Republic.
- 14. All inventories and related documents pertaining to and identifying Emerald Equipment received by or on behalf of EMERALD, NPR, Inc., MBC, or STORAGE from Persons in the Dominican Republic, including but not limited to E.T. Heinsen.
- 15. All records and other documents received by or on behalf of EMERALD NPR, Inc., MBC, or STORAGE from Persons, including but not limited to E.T. Heinsen, relating to Emerald Equipment loaded onboard or discharged from vessels in the Dominican Republic between April 27, 2002 and June 30, 2002.
- 16. All records of electronic gate activities, including but not limited to those at Packer Avenue, Puerto Nuevo, and Jaxport, related to movements of Emerald equipment through June 30, 2002.
- 17. All inventories and other documents pertaining to Emerald Equipment that was put out of service or "P.O.S." after January 1, 2002.
- 18. All documents relating to communications by or on behalf of EMERALD, NPR, Inc., MBC, or STORAGE with other Persons pertaining to Emerald Equipment put out of service after January 1, 2002.

- 19. All documents, including but not limited to TIRs, MITs, and bills of lading, pertaining to on-hire, use, off-hire, and movement by SEA STAR of each piece of equipment included in EMERALD claims in the Amended Counterclaim against SEA STAR.
- 20. All documents, including but not limited to TIRs, MITs, and bills of lading, pertaining to on-hire, use, off-hire, and movement by SEA STAR of each piece of Emerald Equipment listed in Exhibit "A" to this Request for Production.
- 21. All documents, including but not limited to TIRs, MITs, and bills of lading, pertaining to on-hire, use, off-hire, and movement by SEA STAR of each piece of Emerald Equipment listed in Exhibit "B" to this Request for Production.
- 22. All documents, including but not limited to TIRs, MITs, and bills of lading, pertaining to on-hire, use, off-hire, and movement by SEA STAR of each piece of Emerald Equipment listed in Exhibit "C" to this Request for Production.
- 23. All documents, including but not limited to TIRs, MITs, and bills of lading, related to each piece of Emerald Equipment that initially was listed in EMERALD claims delivered to SEA STAR after March 31, 2005.
- 24. All documents pertaining to handwritten notes and computer-generated entries relating to alleged on-hire, off-hire, or movements of Emerald Equipment on MITs and other documents Bates-stamped and produced by EMERALD.

- 25. All documents relating to communications by or on behalf of EMERALD, NPR, Inc., MBC, or STORAGE with Persons other than SEA STAR pertaining to possession, use, storage, recovery, and location of Emerald Equipment.
- 26. All documents pertaining to EMERALD's allegation in paragraph 30 of the Amended Counterclaim that "rent payments made by Sea Star for its use of Emerald Equipment from April 29, 2002 through December 31, 2003 totaled \$683,686.85".
- 27. All inventories and related documents received by or on behalf of EMERALD, MBC, or STORAGE pertaining to Emerald Equipment identified as missing by EMERALD, MBC, NPR, Inc., or Holt Cargo Systems, Inc.
- 28. All documents relating to communications by or on behalf of EMERALD, MBC, or STORAGE with other Persons pertaining to Emerald Equipment identified as missing by EMERALD, MBC, NPR, Inc., or Holt Cargo Systems, Inc.
- 29. All documents pertaining to Emerald Equipment allegedly destroyed by SEA STAR.
- 30. All documents pertaining to Emerald Equipment that SEA STAR lost, as alleged in paragraph 18 of the Amended Counterclaim.
- 31. All documents pertaining to Emerald Equipment that was stolen from or by SEA STAR, as alleged in paragraph 18 of the Amended Counterclaim.

- 32. All documents pertaining to Emerald Equipment that SEA STAR damaged, as alleged in paragraph 18 of the Amended Counterclaim.
- 33. All documents pertaining to Emerald Equipment that SEA STAR failed to return, as alleged in paragraph 18 of the Amended Counterclaim.
- 34. All documents pertaining to Emerald Equipment that SEA STAR failed to return "pursuant to Emerald's demand in accordance with the Equipment Rental Agreement", as alleged in paragraph 24 of the Amended Counterclaim.
- 35. All documents pertaining to each of the "items of Emerald Equipment":
  - (a) which Sea Star acknowledged using but failed "to properly account for the full period of time Sea Star was responsible for rental payments";
  - (b) which Sea Star "never acknowledged using" but used,

as alleged in paragraph 32 of the Amended Counterclaim.

- 36. All documents pertaining to payments after April 27, 2002 to Persons, including but not limited to inland depots and carrier terminals, by or on behalf of EMERALD, MBC, or STORAGE related to Emerald Equipment.
  - 37. All documents used to "purge" SEA STAR self-billing

reports, as testified by Thomas Holt, Sr.

- 38. All equipment manifests, loading guides and summaries, bills of lading, and other documents relating to movements of Emerald Equipment onboard oceangoing vessels other than SEA STAR vessels after April 27, 2002, including but not limited to movements between Dominican Republic and Puerto Rico.
- 39. All documents relating to offers to sell, lease, or rent Emerald Equipment to Persons other than SEA STAR after August 1, 2002.
- 40. All documents, including but not limited to Bills of Sale, relating to sales of Emerald Equipment after August 1, 2003.
- 41. All documents pertaining to SEA STAR on-hire of Emerald Equipment identified in a Bill of Sale to SEA STAR or another Person signed after April 27, 2002.
- 42. All documents, including but not limited to Bills of Sale, relating to sales of Emerald Equipment that resulted in EMERALD adjustments of stipulated loss values specified in the Equipment Rental Agreement, dated as of July 31, 2002.
- 43. All documents pertaining to amounts received by EMERALD, MBC, or STORAGE from Persons other than SEA STAR related to sale, rental, or use of Emerald Equipment after April 27, 2002.
- 44. All documents pertaining to expenses incurred and amounts received by EMERALD, MBC, or STORAGE related to recovery of Emerald Equipment after April 27, 2002.

- 45. All documents pertaining to expenses incurred by EMERALD relating to sale, rental, or use of Emerald Equipment after April 27, 2002.
- 46. All documents pertaining to expenses incurred by EMERALD relating to theft, destruction, or other loss of Emerald Equipment after April 27, 2002.
- 47. All agreements by or on behalf of EMERALD, MBC, STORAGE, and NPR, Inc. with Persons in the Dominican Republic, including but not limited to E.T. Heinsen, pertaining to EMERALD or Emerald Equipment and related documents.
- 48. All documents pertaining to communications by or on behalf of EMERALD, MBC, STORAGE, and NPR, Inc. with Persons in the Dominican Republic, including but not limited to E.T. Heinsen, relating to EMERALD or Emerald Equipment.
- 49. All agreements by or on behalf of EMERALD, MBC, or STORAGE with Persons in Puerto Rico, including but not limited to Martin McDonald, Francisco Gonzalez Rios, Thomas Flores Rios, and Joseph Maqueda, relating to location, recovery, storage, purchase, or sale of Emerald Equipment and related documents.
- 50. All documents relating to communications by or on behalf of EMERALD, MBC, or STORAGE with Persons in Puerto Rico, including but not limited to Martin McDonald, Francisco Gonzalez Rios, Thomas Flores Rios, and Joseph Maqueda, relating to location, recovery, storage, purchase, or sale of Emerald Equipment.

- 51. All agreements by or on behalf of EMERALD, MBC, or STORAGE with Persons other than SEA STAR, including but not limited to Martin McDonald, Francisco Gonzalez Rios, Thomas Flores Rios, Joseph Maqueda, and E.T. Heinsen, pertaining to storage of Emerald Equipment after April 27, 2002.
- 52. All documents relating to communications by or on behalf of EMERALD, MBC, or STORAGE with other Persons, including but not limited to Martin McDonald, Francisco Gonzalez Rios, Thomas Flores Rios, Joseph Maqueda, and E.T. Heinsen, pertaining to sale of Emerald Equipment in Puerto Rico after April 27, 2002.
- 53. All notices of sale of Emerald Equipment delivered to SEA STAR by EMERALD.
- 54. All documents pertaining to public or private sales of Emerald Equipment delivered to SEA STAR by EMERALD.
- 55. All agreements between MBC and STORAGE pertaining to EMERALD or Emerald Equipment and related documents.
- 56. All documents relating to communications between MBC and STORAGE pertaining to EMERALD or Emerald Equipment.
- 57. All agreements between MBC and Thomas Holt, Sr. pertaining to EMERALD or Emerald Equipment and related documents.
- 58. All documents relating to communications between MBC and Thomas Holt, Sr. or Thomas Holt, Jr. pertaining to EMERALD or Emerald Equipment.
  - 59. All guarantees by any Person relating to EMERALD or

Emerald Equipment.

- 60. All agreements, including but not limited to carveout agreements, by or on behalf of EMERALD with STORAGE and related documents.
- 61. All documents relating to purchases of stock in EMERALD after January 1, 1999.
- 62. All documents relating to transfers of legal or equitable interests in EMERALD after April 27, 2002.
- 63. All documents pertaining to the allegation in paragraph 7 of the Amended Counterclaim that SEA STAR purchased "NPR's bookings".
- 64. All documents pertaining to SEA STAR's undertaking "the obligation to report to Emerald its 'usage' of the Emerald Equipment" and "of providing 'self-billing reports'", as alleged in paragraphs 14 and 42 of the Amended Counterclaim.
- 65. All documents pertaining to EMERALD's right "to terminate the Equipment Rental Agreement in accordance with its terms" on October 31, 2003, as alleged in paragraph 16 of the Amended Counterclaim.
- 66. All "detailed invoices to Sea Star setting forth the amounts owed to Emerald under the Equipment Rental Agreement", to which paragraph 21 of the Amended Counterclaim refers.
- 67. All documents pertaining to SEA STAR's "intent to defraud Emerald" and "intention of defrauding Emerald", as alleged

in paragraphs 34, 38, and 48 of the Amended Counterclaim.

- 68. All documents pertaining to SEA STAR's "reckless indifference to the truth of the matters contained in the 'self-billing reports'" or "veracity of the information", as alleged in paragraphs 34 and 37 of the Amended Counterclaim.
- 69. All documents pertaining to SEA STAR's knowledge that the "information contained on [the self-billing] reports was false and misleading", as alleged in paragraph 37 of the Amended Counterclaim.
- 70. All documents pertaining to SEA STAR's backdating of TIRs, as alleged in paragraph 36 of the Amended Counterclaim.
- 71. All documents pertaining to SEA STAR's preparation of "duplicate 'self-billing reports'", as alleged in paragraph 36 of the Amended Counterclaim.
- 72. All documents pertaining to "other information" of SEA STAR's "fraudulent misconduct", as alleged in paragraph 36 of the Amended Counterclaim.
- 73. All documents pertaining to EMERALD's "right to rely", reliance "on the misrepresentations made by Sea Star in the 'self-billing reports'", and justifiable reliance "upon the fraudulently prepared 'self billing reports'", as alleged in paragraphs 39 and 49 of the Amended Counterclaim.
- 74. All documents pertaining to SEA STAR's obligation to compensate and reimburse EMERALD for use of equipment, as alleged

in paragraphs 42 and 43 of the Amended Counterclaim.

- 75. All documents pertaining to EMERALD's allegations in paragraph 44 of the Amended Counterclaim that "Sea Star has made representations which have a tendency to deceive and undermine confidence and are injurious to the public interest."
- 76. All documents pertaining to SEA STAR's "fiduciary duty" to EMERALD alleged in paragraph 52 of the Amended Counterclaim.
- 77. All documents pertaining to the allegation in paragraph 53 of the Amended Counterclaim that SEA STAR "acted in a negligent and undue manner".
- 78. All documents pertaining to the allegation in paragraph 55 of the Amended Counterclaim that SEA STAR "was aware that an accurate report from Sea Star was the only reasonably available method for Emerald to determine the actual usage of the Emerald Equipment."
- 79. All documents pertaining to the allegation in paragraph 56 of the Amended Counterclaim that EMERALD's "reliance on Sea Star's 'self billing reports' was not only justified, it was necessary to maintain the relationship between the parties as provided for in the Equipment Rental Agreement."
- 80. All documents pertaining to EMERALD's right "to collect the actual rents earned based on Sea Star's usage of the Emerald Equipment", as alleged in paragraph 57 of the Amended

Counterclaim.

81. All documents pertaining to and identifying differences between damages claimed for breach of the Equipment Rental Agreement and damages claimed for fraud in the Amended Counterclaim.

SMITH, KATZENSTEIN & FURLOW LLP

Kathleen M. Miller (1D No. 289) 800 Delaware Avenue, 10th Floor

7.0. Box/410

Wilmington, DE 19899 (Courier 19801)

Telephone: 302-652-8400 Telephone: 302-652-8405

Email: kmiller@skfdelaware.com

Attorneys for Sea Star Line, LLC

#### OF COUNSEL:

Charles C. Robinson
Garvey Schubert Barer
1191 Second Avenue, #1800
Seattle, WA 98101-2939
Telephone: 206.816.1451
Facsimile: 206.464.0125
Email: crobinson@gsblaw.com

#### and

Timothy J. Armstrong Armstrong & Mejer, P.A. Suite 1111 Douglas Centre 2600 Douglas Road Miami, FL 33134 Telephone: 305-444-3355

Fax: 305-442-4300

# **EXHIBIT A**

FFFZ012072	FVIC046829	FVIC047770	FVIC083811	FVIC140947	JSCZ040516
PRGS001002	PRGS001003	PRGS001005	PRGS001007	PRGS001009	PRGS001011
PRGS001012	PRGS001014	PRGS001016	PRGS001017	PRGS001019	PRGS001021
PRGS001022	PRGS001024	PRGS001025	PRGS001026	PRGS001028	PRGS001029
PRGS001031	PRGS001033	PRGS001035	PRGS001036	PRGS001037	PRGS001038
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PRGS001335	PRGS001336	PRGS001337	PRGS001339	PRGS001342	PRGS001351
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PRGS001413	PRGS001416	PRGS001417	PRGS001423	PRGS001424	PRGS001429
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TXXZ174251	TXXZ174496	TXXZ174839	TXXZ175625	TXXZ181366	TXXZ181524
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UFCC072346	UFCC075761	UFCC077620	UFCC077707	UFCC079530	UFCC079975
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UFCC084418	UFCC085320	UFCC085336	UFCC085376	UFCC085556	UFCC086037
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## **EXHIBIT B**

### Unit Numbers in Claims Added by Emerald in 2006

FFFZ049307	FVIC083811	PRGS001005	PRGS001007	PRGS001012	PRGS001019
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PRGS001185	PRGS001201	PRGS001203	PRGS001207	PRGS001217	PRGS001224
PRGS001243	PRGS001252	PRGS001296	PRGS001304	PRGS001319	PRGS001352
PRGS001364	PRGS001402	PRGS001408	PRGS001440	PRGS001453	PRGS001467
PRGS001485	PRGS001539	PRGS001575	PRGS001606	PRGS001620	PRGS001626
PRGS001667	PRGS001671	PRGS001672	PRGS001702	PRGS001707	PRGS001883
PRGS001894	PRGS001903	PRGS001911	PRGS001912	PRGS001937	PRGS001944
PRGS001984	PRGS001988	PRMC045002	PRMC045011	PRMC045016	PRMC045124
PRMC045163	PRMC045296	PRMC045303	PRMC045306	PRMC045326	PRMC045393
PRMC045428	PRMC045445	PRMC045460	PRMC045464	PRMC045524	PRMC120008
PRMC120020	PRMC120029	PRMC120049	PRMC120072	PRMC171368	PRMC171369
PRMC171373	PRMC171374	PRMC171417	PRMC172150	PRMC172155	PRMC172167
PRMC172174	PRMC172175	PRMC172180	PRMC172186	PRMC172947	PRMC172972
PRMC172975	PRMC172982	PRMC172995	PRMC172998	PRMU595125	PRMU595145
PRMU600309	PRMU600310	PRMU600325	PRMU600342	PRMU600350	PRMU600354
PRMU653328	PRMU653367	PRMU653372	PRMC120133	PRMC120136	PRMC120162
PRMC120186	PRMC120207	PRMC120212	PRMC120227	PRMC120238	PRMC120244
PRMC120264	PRMC120267	PRMC120282	PRMC120315	PRMC120316	PRMC120323
PRMC120342	PRMC120344	PRMC120354	PRMC120358	PRMC120359	PRMC120399
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PRMC150821	PRMC150842	PRMC150871	PRMC150892	PRMC150895	PRMC150897
PRMC150900	PRMC150910	PRMC150919	PRMC150940	PRMC151004	PRMC151026
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### Unit Numbers in Claims Added by Emerald in 2006

PRMC170095	PRMC170124	PRMC170136	PRMC170160	PRMC170200	PRMC170204
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PRMC170354	PRMC170362	PRMC170363	PRMC170384	PRMC170397	PRMC170403
PRMC170406	PRMC170407	PRMC170418	PRMC170435	PRMC170439	PRMC170440
PRMC170450	PRMC170451	PRMC170463	PRMC170485	PRMC170486	PRMC170502
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PRMC171358	PRMC171428	PRMC171441	PRMC171444	PRMC171446	PRMC171459
PRMC171485	PRMC171488	PRMC171497	PRMC171498	PRMC171508	PRMC171511
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PRMC171584	PRMC171596	PRMC171617	PRMC171650	PRMC171652	PRMC171654
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PRMC172687	PRMC172689	PRMC172694	PRMC172697	PRMC172700	PRMC172702
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### Unit Numbers in Claims Added by Emerald in 2006

PRMU220219	PRMU220234	PRMU220235	PRMU220244	PRMU220269	PRMU220321
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PRMU595361	PRMU595404	PRMU595436	PRMU595489	PRMU595526	PRMU595554
PRMU595582	PRMU595584	PRMU595597	PRMU595599	PRMU595607	PRMU595630
PRMU595676	PRMU595693	PRMU595714	PRMU595744	PRMU595773	PRMU595807
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PRMU600220	PRMU600402	PRMU600458	PRMU600478	PRMU600526	PRMU600530
PRMU600546	PRMU600572	PRMU600640	PRMU600645	PRMU600729	PRMU609525
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PRMU650208	PRMU650296	PRMU650299	PRMU650303	PRMU650362	PRMU650387
PRMU650397	PRMU650400	PRMU650446	PRMU650470	PRMU650472	PRMU650590
PRMU650592	PRMU650608	PRMU650615	PRMU650636	PRMU650639	PRMU650647
PRMU650667	PRMU650687	PRMU650711	PRMU650729	PRMU650731	PRMU650736
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PRMU650954	PRMU650971	PRMU650975	PRMU650978	PRMU650982	PRMU653135
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TXXZ181366	TXXZ181832	UFCC079975	UFCC081064	UFCC081546	UFCC086037
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# **EXHIBIT C**

## Units Numbers in Emerald Dominican Republic DV Claims

PRMC045043	PRMC045245	PRMC045247	PRMC045352	PRMC045491	PRMC150118
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PRMC150656	PRMC150667	PRMC150733	PRMC150807	PRMC150827	PRMC150843
PRMC150851	PRMC150926	PRMC150957	PRMC151040	PRMC151143	PRMC151153
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PRMU595434	PRMU595540	PRMU600531	PRMU653395	PRMU673234	PRMU673267
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PRMZ173662	TXXZ171527	UFCC072495	UFCC700900	FFFZ049307	PRGS001000
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#### Units Numbers in Emerald Dominican Republic DV Claims

TXXZ167970 TXXZ180799 TXXZ170248 TXXZ181372 TXXZ170276 TXXZ182425 TXXZ174298

TXXZ174423

TXXZ175647

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